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Columbia*

February 7, 2011

**FILED/ACCEPTED**

**ORIGINAL**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, Room TW-B204  
Washington, DC 20554

**FEB - 7 2011**

Federal Communications Commission  
Office of the Secretary

**Attention: Richard Hindman**  
**Chief, Telecommunications Consumers Division**  
**Enforcement Bureau**  
**Room 4-C244**

**Re: Compliance filing of**  
**Stanton Long Distance, L.L.C.**  
**File No. EB-08-TC-5437**

**FILED/ACCEPTED**  
**FEB 4 2011** E. Williams  
Federal Communications Commission  
Office of the Secretary

Dear Ms. Dortch:

Stanton Long Distance, L.L.C. (the "Company") hereby submits this compliance filing in response to paragraph 10 of the Consent Decree issued as an attachment to the Order by the Commission released on July 29, 2009. *See In the Matter of Stanton Long Distance, LLC, Order*, File No. EB-08-TC-5437, DA 09-1602, released July 29, 2009. Attached hereto is a copy of the Company's annual section 64.2009(e) compliance certificate and accompanying statement filed this day in EB Docket No. 06-36 covering the prior calendar year 2010. A copy of this submission is being provided electronically to Mika Savir of the Telecommunications Consumers Division of the Commission's Enforcement Bureau.

Please direct any inquiries concerning this matter to the undersigned.

Sincerely,

*Thomas J. Moorman*

Thomas J. Moorman  
Counsel for  
Stanton Long Distance, L.L.C.

Attachment

cc: M. Savir (via email)

No. of Copies rec'd 0  
List A B C D E



**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

1. Date filed: February 7, 2011
2. Name of company(s) covered by this certification: Stanton Long Distance, L.L.C.
3. Form 499 Filer ID: Stanton Long Distance, L.L.C. - 822946
4. Name of signatory: Robert J. Paden
5. Title of signatory: Vice President/General Manager
6. Certification:

I, Robert J. Paden certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

Robert J. Paden

**Attachment:** Accompanying Statement explaining CPNI procedures

STANTON LONG DISTANCE, L.L.C.  
P.O. BOX 716  
1004 IVY STREET  
STANTON, NE 68779-0716  
402-439-2264  
FAX: 402-439-7777

STATEMENT

Stanton Long Distance, L.L.C. (the "Company") has established operating procedures that ensure compliance with the Federal Communications Commission regulations regarding the protection of customer proprietary network information ("CPNI"). These procedures include but are not limited to:

- The Company has appointed a CPNI Compliance Officer. The Compliance Officer is responsible for ensuring that the Company is in compliance with all of the CPNI rules and is the point of contact for anyone with questions about CPNI.
- The Company has established authentication procedures for providing both call detail and non-call detail information on a customer initiated call. If the customer comes into the office, the customer must provide a valid photo ID matching the customer's account information.
- The Company has a process to track and notify customers whenever a change is made to the customer's account. For example, a change of address is sent to the customer's old address of record to verify the address change.
- The Company has a process for reporting breaches that comply with the reporting requirements. A record of any breach will be maintained for a minimum of two years.
- The Company has not provided notification to its customers and has not asked for approval to use CPNI because it only uses CPNI in those instances where it is permissible to use CPNI without customer approval. The Company does not share CPNI with any joint venture partner, independent contractor or any other third party. For marketing purposes, the Company does not use CPNI because it does mass marketing to all customers. If in the future, the Company decides to ask customers for approval to use their CPNI, it will implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of any CPNI.
- The Company continually educates and trains their employees regarding the appropriate use of CPNI. The training includes, but is not limited to, when employees are and are not authorized to use CPNI. Employees are instructed that if they ever have any questions regarding the use of CPNI, if they are aware of CPNI being used improperly by anyone, or if they encounter someone other than the authorized person on an account trying to access CPNI that they should contact the Compliance Officer immediately.
- The Company has established specific disciplinary procedures should an employee violate the CPNI procedures established by the Company. The disciplinary procedures are reviewed with employees and are kept in a permanent Company file.
- The Company does not conduct any marketing campaigns that use customer's CPNI at this time, but it does have a supervisory review and approval process documented that must be followed if the Company's sales personnel make a decision to conduct a marketing campaign. The Company will ensure that a record of any marketing campaign of its own, or its affiliates, will be maintained for a minimum of one year. The record will include a description of the campaign, the specific CPNI that was used in the campaign and what products and services were offered as part of the campaign.
- The Compliance Officer will ensure that a compliance certification signed by an officer of the company is filed with the FCC by March 1 of each year. A copy of the certification will be kept permanently.
- The Company's CPNI procedures include reasonable measures to discover and protect against activity that is indicative of pretexting or any other type of unauthorized access to CPNI. Employees are instructed to notify the Compliance Officer immediately of any suspicious activity.

**Your submission has been accepted****ECFS Filing Receipt - Confirmation number: 201127159354****Proceeding**

Name	Subject
06-36	CPNI Compliance Certification Annual Filing

**Contact Info**

Name of Filer: Stanton Long Distance, L.L.C.  
Email Address: tmoorman@woodsaitken.com  
Attorney/Author Name: Thomas J. Moorman  
Lawfirm Name: Woods & Aitken LLP  
(required if represented by counsel):

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State: DISTRICT OF COLUMBIA  
Zip: 20007

**Details**

Type of Filing: OTHER

**Document(s)**

File Name	Custom Description	Size
2 7 11 CPNI Cert Filing -- Stanton Long Distance.pdf		189 KB

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